

**REMARKS**

Claims 1-9 are pending in the application.

**§ 102 Rejections**

In the Office Action, claims 1, 3, 4, 6 and 7-9 were rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 6,744,769 to Siu, *et al.*, hereinafter “Siu.”

**Brief Description of the Cited Art**

Siu describes a technique for provisioning a path between an origin node (O) and a destination node (D) in a bi-directional line switched ring (BLSR) network. According to the technique, (a) an OD ring pair is identified from a plurality of pairs; (b) a ring sequence is selected from a plurality of valid ring sequences; (c) a current path associated with the ring sequence is calculated; (d) the calculated current path is compared with a current path in a database to determine if it is a better path and if so, the database is updated with the calculated current path; (e) inter-ring connection configurations are assigned and steps “d” and “e” are repeated until a first communication path is obtained; (f) steps “b” to “e” are repeated for each valid ring sequence until a second communication path is obtained; and steps “a” through “f” are repeated for each OD ring pair until an optimal path is found. See Siu, column 3, lines 35-52, Fig. 5 and column 6, line 56 to column 9, line 67.

**Differences Between the Cited Art and the Present Invention**

Representative claim 1 recites:

1. A method of increasing network processing node interconnect capacity and reducing maximum hop count in a scalable multidimensional ring network by creating additional rings comprising the steps of:
  - (a) selecting a node identification algorithm;
  - (b) *selecting an initial network processing node in the scalable multidimensional ring network as a first node in a new ring;*
  - (c) *applying the node identification algorithm to the selected node to calculate a subsequent node in the new ring;*
  - (d) *making the calculated node the selected node;*
  - (e) *repeating steps c-d until the selected node is the initial network processing node, thereby creating the new ring;* and

(f) repeating steps b-e until all nodes in the scalable multidimensional ring network have been processed according to steps (b) through (e), thereby creating all new rings in the scalable multidimensional ring network.

The Applicant respectfully submits that Siu does not explicitly or inherently disclose the Applicant's claimed combination of *selecting an initial network processing node in the scalable multidimensional ring network as a first node in a new ring, (c) applying the node identification algorithm to the selected node to calculate a subsequent node in the new ring, (d) making the calculated node the selected node and repeating steps c-d until the selected node is the initial network processing node, thereby creating a new ring.*

First, nowhere does Siu teach or suggest the above steps claimed by the Applicant. As noted above, Siu teaches various steps for calculating an optimal path from one node to another in a BLSR network. These steps involve calculating a current path and comparing it to a database of existing current paths to select an optimal path between an "O" node on one ring in the network and a "D" node on a different ring in the network. While these steps involve working with rings, none of these steps teach or suggest the above steps claimed by the Applicant for creating a ring.

Second, the technique described by Siu is directed towards calculating an optimal path between two nodes on different rings where the calculated path begins at one node (the "O" node) and ends at a different node (the "D" node). The Applicant's claims, on the other hand, are directed to calculating a ring in a network wherein the calculated ring begins at a particular node and ends at that same node. Nowhere does Siu teach or suggest calculating a path that begins and ends at the same node.

Third, Siu's technique assumes that the two nodes are attached to already existing rings. Since the rings already exist, there is no need to calculate them. The Applicant's claimed invention, on the other hand, does not make this assumption but rather assumes a ring does not exist and calculates it.

Because of the absence of *selecting an initial network processing node in the scalable multidimensional ring network as a first node in a new ring, (c) applying the node identification algorithm to the selected node to calculate a subsequent node in the new ring, (d) making the calculated node the selected node and repeating steps c-d until the selected*

*node is the initial network processing node, thereby creating a new ring* in Siu, the Applicant respectfully submits that Siu does not render the Applicant's claims 1, 3, 4, 6 and 7-9 anticipated. Therefore, the Applicant respectfully requests that the above rejections of these claims be withdrawn.

§ 103 Rejections

In the Office Action, claims 2 and 5 were rejected under 35 U.S.C. § 103 as being unpatentable over Siu.

As noted above, these claims contain elements that are not disclosed either implicitly or explicitly in Siu. Therefore, the Applicant respectfully submits that Siu does not render these claims obvious under 35 U.S.C. § 103 and respectfully requests that the above rejections to these claims be withdrawn.

CONCLUSION

In view of the above remarks, it is believed that all claims are in condition for allowance, and it is respectfully requested that the application be passed to issue. If the Examiner feels that a telephone conference would expedite prosecution of this case, the Examiner is invited to call the undersigned.

Respectfully submitted,

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